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ENVIRON

163209

June 6, 1996

Edward J. Hanlon
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Dutch Boy Site, Chicago, Illinois

Dear Mr. Hanlon:

Enclosed are revised Section III of the Work Plan and Table 1, as we discussed. Please call me if you have any questions.

Sincerely,

Ranjit J. Machado, P.E.
Project Coordinator

cc: Christine Liszewski, Esq. (facsimile)
Reed Oslan, Esq.

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III. SCOPE OF WORK

A. Site Security Plan

As required by the Order, ENVIRON will develop and submit to USEPA a detailed plan for Site security to mitigate trespassing by unauthorized persons. The Site Security Plan (SSP) will include the installation of a perimeter fence with a locking gate. Signs warning that hazardous materials are present at the Site will also be posted. The fence will serve as the primary barrier against Site trespassing during periods of no Site activity. Fencing specifications will be described in the SSP. If necessary, the plan will also include supplemental security measures to be implemented during periods of Site activity. The SSP will also include provision for documentation of all Site visitors and any other perimeter security matters throughout the implementation of removal activities at the Site.

As specified in the RAWP schedule (Chapter IV), the SSP will be developed and submitted to USEPA within one week after receipt of USEPA approval of the RAWP. Implementation of the SSP will be completed within three weeks after receipt of USEPA approval of the SSP.

B. Sampling and Analysis Plan

A detailed sampling and analysis plan (SAP) will be developed in accordance with the requirements outlined in the Order. Specifically, the SAP will be designed consistent with the Order to: (1) identify the vertical and horizontal extent of on-site soil contamination; (2) determine the background concentrations of lead in the soils in the vicinity of the site; and (3) determine whether lead is present beyond the boundaries of the site and the extent of such contamination.

The SAP will specify the number and location of soil borings to be installed at the Site (and off-site areas), and the analyses to be conducted on samples collected. To design the SAP, ENVIRON will compile and review the following information:

- Reports on previous sampling and analysis conducted at the Site including:

  Ecology & Environment, Inc., *Site Assessment Report for International Harvester/Dutch Boy Site*, August 1995. Volumes 1 and 2.

  Harza Environmental Services, *Limited Soil Investigation and Paint Sampling,*

Former Dutch Boy Site, June 1994.

Simon Hydro-Search, Inc., *Environmental Assessment Report, 120th and Peoria Streets, Chicago, Illinois*, November, 1993.

Toxcon Engineering Company, *Analytical Results, Phase III - Supplemental Site Investigation, Dutch Boy Paint*, August 1988.

Toxcon Engineering Company, *Analytical Results, Phase III - Site Investigation, Dutch Boy Paint Plant Site,* September 1987.

Professional Service Industries, Inc., *Subsurface Exploration, 120th Street and Peoria Avenue*, July 1987.

Toxcon Engineering Company, *Investigation of the Former Dutch Boy Site, 120th and Peoria Streets*, 1987.

Envirodyne Engineers, Inc., *Immediate Removal Project for Dutch Boy Paint Co./NL White Lead Plant, Chicago, Illinois*, July 1986

- Historical Site information regarding the nature and configuration of lead emissions sources, location of processing operations, material stockpiles and storage areas, storage tanks and pipelines, and any other potentially useful information available.

- Historical information regarding activities conducted at the Site including lead operations, disposal practices, and previous removal/demolition activities. Historical records and depositional testimony will be the primary source of such information.

- Physical Site characteristics including local windrose data, topography, geology and hydrogeology, and the presence of on-site structures, pavement, and other significant physical characteristics.

The SAP will be developed based on a review of Site information and an evaluation of the likely

area of lead impact that may have resulted from Site activities. Ancillary activities (e.g., surveying, management of drill cuttings and other investigation-derived waste) will also be detailed in the SAP.

All sampling and analyses will be conducted in accordance with a detailed Quality Assurance Project Plan (QAPP) that will be submitted as part of the SAP. The QAPP will describe the policy, organization, and functional activities and the data quality objectives and measures necessary to achieve adequate data for use in development of the Risk Management Plan as described below. The QAPP will be consistent with the guidance provided in "*Interim Final Quality Assurance/Quality Control Guidance for Removal Activities: Sampling, QA/QC Plan and Data Validation Procedures,*" dated April 1990.

ENVIRON anticipates that a comprehensive SAP, incorporating the above components can be developed and submitted to USEPA by July 8, 1996. As part of the EOC determination, the SAP will also include a methodology for determining background concentrations of lead. The background sampling approach will be developed based on regulatory guidance and the scientific literature, and is intended in determining lead concentrations in soil in an area similar in setting to that in which the site is located.

Upon receipt of USEPA approval, assuming access to sampling areas is obtained, ENVIRON will implement the SAP and will prepare and submit to USEPA an EOC report summarizing the actions taken during this event. The report will include a detailed description of the review of information described previously and present a summary of relevant Site history, the results of previous Site investigations, and a detailed description of the Site's physical characteristics. The report will describe in detail all field activities and present all sampling results conducted as part of the SAP. The report will include figures showing the horizontal and vertical extent of lead in on-site and off-site soils consistent with the objectives of the SAP stated above.

ENVIRON projects that implementation of the SAP and submission of the EOC report can be completed within approximately ten weeks after USEPA issues approval of the SAP. This time frame consists of approximately three weeks to retain subcontractors, schedule and mobilize field crews, complete utility markout, and implement the field sampling program. The schedule assumes a standard 28-day (four week) laboratory turnaround time. Upon receipt of analytical data from the laboratory, at least two weeks will be required for data analysis and validation, and to develop an EOC report consistent with the requirements of the Order. This schedule reflects the first phase of sampling. The results of implementing the SAP may indicate that further sampling is necessary which will require a modification to the schedule.

C. Risk Management Plan

Upon USEPA approval of the EOC report, ENVIRON will develop and submit a Risk Management Plan (RMP) to reduce the risks associated with lead-contaminated soils on-site and off-site. The RMP will include the following major elements:

- Site Description. A detailed description of the Site and surrounding areas will be included in this section of the RMP. The Site description will include a summary of the surrounding land use, identification of potential receptors, topography, geology and hydrogeology, and climatic data.

- Extent of Contamination Summary. A summary of the findings of the SAP and EOC report will be included in this section. Summary figures identifying areas exceeding cleanup goals will be developed and included.

- Identification and Screening of Appropriate Removal Action Alternatives. Various removal action alternatives will be considered for implementation at the Site that will reduce the risks associated with lead-contaminated soils on-site and off-site. In this section, a set of alternatives that are adequately protective of human health will be identified and screened based on consideration of their feasibility and ease of implementation at the Site. A comparison of the screened feasible alternatives will then be made based on their respective costs. Excavation and off-site disposal of soils exceeding the cleanup goal of 1,400 ppm will be considered in the RMP. In addition, various alternatives will be evaluated in the RMP that may not include removal of soils exceeding an average of 1,400 ppm, but achieve protection by other means such as limiting access to soils by institutional controls or deed restrictions (to the extent that they do not unduly restrict future use), consolidation and capping, or paving. Risk-based methodologies will be used to ensure that the recommended alternatives are adequately protective.

  Based on the screening analysis described above, an appropriate alternative will be selected for implementation at the Site that is cost-effective and protective of human health and the environment, which will be submitted to USEPA along with the RMP. Upon approval of the RMP and the selected alternative by USEPA, the approved alternative to abate the hazards associated with lead-contaminated soils on-site and off-site will be implemented, consistent with the terms of the Order.

- Implementation Schedule. Implementation of the RMP will be dependent on the results of the EOC, and the approved alternative to be implemented at the Site. A detailed implementation schedule will be developed and submitted as part of the RMP.

ENVIRON anticipates completion of the RMP eight weeks after USEPA approval of the EOC report.

D. Final Report

At the conclusion of Site activities undertaken pursuant to Sections A-C above, ENVIRON will prepare a final report summarizing the actions taken to comply with the Order. The report will identify the Site, summarize the findings of the SAP, and discuss the selection of an appropriate remedy for the Site as detailed in the RMP. The report will also present a chronology of events, and description of all actions performed under the Order; provide a listing of the resources committed to perform the work; identify all items that affected actions undertaken to comply with the Order; and include a discussion of problem resolution. In addition, a list of quantities and types of materials removed from the Site will be provided along with a discussion of the removal and disposal options considered, and ultimate destination of the materials. Analytical results from all sampling and analyses performed, and all relevant paperwork accrued during the action (manifests, contracts, permits, bills, and invoices) will be included.

The final report will include an affidavit from the person who directed the report preparation. The affidavit will certify under penalty of law that, based on personal knowledge and appropriate inquiries of all other persons involved in the preparation of the report, the information submitted is true, accurate, and complete to the best of the affiant's knowledge and belief. The report will be submitted to USEPA within sixty calendar days of completion of the work required under the Order.

TABLE 1 **Preliminary Schedule of Events** **Dutch Boy Site** **Chicago, Illinois**	
Task/Event	Date
Develop and Submit Draft Removal Action Work Plan (RAWP)	5/2/96
USEPA Issues Comments on Draft RAWP	5/21/96
Revise and Resubmit RAWP	5/31/96
USEPA Issues Approval of RAWP	6/10/96
Develop and Submit Site Security Plan (SSP) (One Week from Receipt of RAWP Approval)	6/17/96
USEPA Issues Approval of SSP*	6/24/96
Complete Implementation of SSP (Three Weeks from Receipt of SSP Approval)	7/15/96
Develop and Submit Site Sampling and Analysis Plan (SAP)	7/3/96
USEPA Issues Comments on SAP	7/17/96
Revise and Resubmit SAP (Two Weeks from Receipt of USEPA Comments)	7/31/96
USEPA Approves Revised SAP	8/7/96
Complete Implementation of SAP and Submit Report on Extent of Contamination (EOC) (Ten Weeks from Receipt of SAP Approval)	10/16/96
USEPA Issues Comments on EOC Report	10/31/96
Revise and Resubmit EOC Report (Two Weeks from Receipt of USEPA Comments)	11/13/96
USEPA Approves Revised EOC Report	11/20/96
Develop and Submit Risk Management Plan (RMP) (Eight Weeks from Receipt of EOC Report Approval)	1/15/97
USEPA Issues Comments on RMP	2/5/97

TABLE 1 Preliminary Schedule of Events Dutch Boy Site Chicago, Illinois	
Task/Event	Date
Revise and Resubmit RMP (Two Weeks from Receipt of USEPA Comments)	2/19/97
USEPA Approves Revised RMP	2/26/97
* All subsequent dates are contingent upon obtaining appropriate access agreements.	